

**REMARKS**

Claims 2, 5-21, 24-34 and 37-60 are pending in the application.

Claims 2, 5-21, 24-34 and 37-60 have been rejected.

Claims 2, 15, 21, 34 and 49 have been amended.

Unless otherwise specified in the below discussion, Applicants have amended the above-referenced claims in order to provide clarity or to correct informalities in the claims. Applicants further submit that, unless discussed below, these amendments are not intended to narrow the scope of the claims. By these amendments, Applicants do not concede that the cited art is prior to any invention now or previously claimed. Applicants further reserve the right to pursue the original versions of the claims in the future, for example, in a continuing application.

**Rejection of Claims Under 35 U.S.C. §112**

Claims 2, 5-21, 24-34 and 37-60 stand rejected under 35 U.S.C. §112, first paragraph, as purportedly failing to comply with the written description requirement. Applicants respectfully request this rejection.

The Office Action rejects the above claims on the basis that certain claim elements added during the claim amendments for the previous Response to Office Action purportedly “lack proper support in the Applicants’ Specification.” See Office Action, p.3. The first objected-to claim element is “in a media-independent manner” (from the claim limitation “a configurable communication server configured to communicate, in a media-independent manner”). Applicants respectfully submit that support for this claim element can be found at least in the

following sections of the Substitute Specification filed on August 7, 2001<sup>1</sup>: p.6, ll.24-26 (“Client/server system 100 also includes a communication server 109 that enables agents to use communication channels of different media types to communicate with customers.”); p.8, ll.8-9 (“Communication server 109 handles all communication between agents and customers via communication channels 130 of one or more media types. Communication server 109 is not media specific and has no knowledge of communication channels or media.”); p.9, ll.3-7 (Communication server 109 operates independently of communication channel media types).

The Office Action further objects to claim element “media-specific communication channel” (from the claim limitation “a configurable communication server configured to communicate, in a media-independent manner, via a media-specific communication channel”). Applicants respectfully submit that support for the claimed media-specific communication channel can be found at least at the following sections of the Substitute Specification: p.6, ll.11-14 (indicating that at least two of the disclosed communication channels support different media types); p.6, ll.24-26 (“Client/server system 100 also includes a communication server 109 that enables agents to use communication channels of different media types to communicate with customers.”).

The Office Action further objects to the claim limitation “wherein the channel driver is configured” (from the previously amended limitation “wherein said channel driver is configured according to an interface that facilitates communication between the communication server and the channel driver in said media-independent manner”). While Applicants have amended this claim limitation in the present Response, Applicants submit that support for both the previous

---

<sup>1</sup> All page and lined number references in this Office Action relate to the Substitute Specification.

claim element and the currently amended claim element can be found at least in the following sections of the Substitute Specification: p.8, ll.14-17; p.8, ll.20-21; p.9, ll.3-7.

For at least the above reasons, Applicants respectfully submit that the claim elements “a media-independent manner,” “media-specific communication channel,” and “wherein the channel driver is configured” all find support in the Specification of the present Application. Applicants therefore respectfully submit that Claims 2, 5-21, 24-34 and 37-60 are supported by the Specification and are in condition for allowance, and Applicants request the Examiner’s reconsideration and withdrawal of the rejections to these claims.

Claims 15-21, 24-34, 37-53 and 57-60 stand rejected under 35 U.S.C. §112, first paragraph, as purportedly lacking support in the Specification of the present Application for limitations “first interface” and/or “second interface.” *See* Office Action, p.4. Applicants respectfully traverse this rejection.

Support for the claimed “first user interface object” can be found at least at the following section of the Substitute Specification:

When an event such as arrival of an incoming telephone call occurs, the user interface notifies the agent using a notification function to change the user interface to capture the agent’s attention. For example, a notification function can cause a button to blink to notify the agent of the phone call. A notification function can also display other information such as information about the caller before the agent picks up the phone.

Substitute Specification, p.18, ll.20-24. Applicants respectfully submit that the above-quoted section of the Specification provides disclosure of an object on a user interface that provides notification (e.g., a blinking button or an object providing information about the caller).

The Office Action further objects to the claimed “second user interface object capable of being activated.” *See, e.g.*, Claim 13. Applicants respectfully submit that support for this limitation can be found at least in the following sections of the Specification:

When the agent uses tool bar 105 to accept a telephone call, put a call on hold, or release a call, the user interface sends a command to session mode communication server 110 which communicates with one of channel drivers 120 to issue the command to the communication channel controlling the telephone.

Application, p.18, ll.25-28; *see also* Application, p.15, ll.15-16 (“Every click on a button of tool bar 105 invokes a command, which is issued to channel driver 120.”); p.41, ll.14-18 (the disclosed work item object). Applicants respectfully submit that the above-cited sections relate to examples of user interface objects that are capable of being activated, as claimed. Applicants further submit that these objects can be the same or different than the claimed first user interface object, discussed above.

For at least these reasons, Applicants respectfully submit that the limitations “first interface” and “second interface” find support in the Specification and are therefore allowable over 35 U.S.C. §112, paragraph 1. Applicants therefore respectfully request the Examiner’s reconsideration and withdrawal of the rejections to Claims 15-21, 24-34, 37-53 and 57-60 and an indication of the allowability of same.

*Rejection of Claims Under 35 U.S.C. §102*

Claims 2, 5-21, 24-34 and 37-60 stand rejected under 35 U.S.C. §102(e) as purportedly being anticipated by U.S. Patent No. 6,704,409 issued to Dilip et al. (“Dilip”). Applicants respectfully traverse this rejection.

Independent Claims 2, 15, 21, 34 and 49 each contain a limitation of substantially the following form:

a web browser-based media-independent user interface comprising a first user interface object configured to provide a notification of the event received from the communication channel.

*See, e.g.*, Claim 2 (amended). Applicants respectfully submit that the sections of Dilip cited by the Office Action fail to provide disclosure of these limitations.

Dilip discloses a transaction control system that is purportedly capable of receiving both real-time transactions and non-real-time transactions such as telephone calls, electronic mail, voice mail, facsimiles, and the like. *See* Dilip, Abstract; Dilip 4:35-41. Dilip's control system purportedly processes the received transactions using a transaction controller. In Dilip, real-time transactions may be assigned a higher priority for response than non-real-time transactions. Dilip's control system can purportedly queue a received transaction, if no agent is available to process the received transaction. *See* Dilip, Abstract. Generally, transactions in Dilip can be either inbound (received by the transaction processing or control system) or outbound (transmitted from the transaction processing system). *See* Dilip 4:4-6. Dilip provides that there may be a single or separate servers for each type of transaction supported by Dilip's transaction processing system. *See* Dilip Fig. 2; Dilip 5:48-52, 7:1-6. Dilip further teaches that an agent can purportedly handle multiple types of transactions through the centralized control system. *See* Dilip 3:25-47. When an agent becomes available, the highest priority transaction, of any type, is purportedly provided to the agent. *Id.* This reduces the possibility that an agent will be idle for a significant period of time and supervisors are not required to manually switch agents from handling one type of transaction to another because Dilip's transaction controller purportedly

handles transaction selection automatically. *See* Dilip 13:45-54 (an agent's system is automatically prepared to handle the next transaction).

The sections of Dilip cited by the Office Action as purportedly providing disclosure of the claimed web browser-based media-independent user interface failed to provide any such disclosure. The first section cited by the Office Action is as follows:

Thus, when an agent is available to receive a transaction, the highest priority transaction, of any type, is provided to the agent.

Dilip 2:29-31. Applicants respectfully submit that this section of Dilip provides no disclosure of a web browser at all and no provision for a user interface of any type, let alone a user interface that is media-independent, as claimed. Finally, this section of Dilip provides no disclosure of the claimed "notification of the event received from the communication channel." Instead, this section only provides that "the highest priority transaction, of any type, is provided to the agent." There is no implication in this statement of notification of an event, as that term is defined and claimed in the current Application.

The Office Action further cites to the following section as purported disclosure of the claimed web browser-based media-independent user interface:

Alternatively, some or all of the agents 20 may be coupled directly to transaction processing system 10, rather than coupled through LAN 16. Although agents 20 are represented in Fig. 1 by a computer, a particular agent 20 may utilize any type of device or system that allows interaction between the agent and an initiator of the transaction (e.g., a customer). For example, an agent handling only telephone call transactions may only use a telephone system, without requiring a computer. Similarly, an agent handling only e-mail messages may require a computer system, but not a telephone. In a particular embodiment of the invention, each agent has a computer system and a telephone (which may be integrated into the computer system), such that the agent is capable of handling and responding to multiple types of transactions (e.g., telephone calls, e-mail, voice mail, and facsimiles).

Dilip 5:6-21. Applicants respectfully submit that once again in the cited section there is no disclosure of the claimed “web browser-based media-independent user interface” or of any user interface configured to receive event notifications. Instead, the cited section provides that an agent can either be coupled directly to the transaction processing system or through a LAN and that an agent may have a computer, a telephone, or both. And in fact, since the disclosure relates to specifically a telephone or a computer, there is no disclosure of the claimed media independence. Finally, the cited section provides no disclosure of a user interface object that is configured to provide notification of events. Again, Dilip only provides for providing an agent “the highest priority transaction” and does not provide for extending a notification to an agent to address an incoming event, as claimed. *See, e.g.*, Dilip 14:15-18, 14:29-46.

For at least these reasons, Applicants respectfully submit that the cited sections of Dilip fail to provide disclosure of the claimed “web browser-based media-independent user interface comprising a first user interface object configured to provide a notification of the event received from the communication channel” as provided in independent Claims 2, 15, 21, 34 and 49.

Independent Claims 2, 15, 21, 34 and 49, as amended, each contain substantially the following limitation:

a configurable communication server configured to communicate, in a media-independent manner, via one or more media-specific communication channels using corresponding channel drivers associated with each communication channel, wherein

the communication server is configured to communicate independently of a media type of a corresponding communication channel, and

each channel driver is configured according to a common communication application program interface for communication with the communication server.

*See, e.g.*, Claim 2 (as amended). Applicants respectfully submit that Dilip fails to provide disclosure of these amended limitations.

Dilip fails to provide disclosure of a common communication application program interface as claimed. Dilip fails to provide disclosure of any single communication interface with Dilip's transaction controller. In fact, Dilip anticipates a plurality of communication interfaces.

An interface controller 72 controls the various interfaces between transaction controller 44 and other devices coupled to transaction controller 44. These interfaces include interfaces to each server 56-66, transaction processing system 40, a PSTN, a LAN, and to the Internet.

Dilip 8:20-25 (emphasis added). Thus, Dilip fails to provide a single communication interface around which channel drivers can be configured. The above-quoted section of Dilip only anticipates needing a plurality of interfaces to communicate with Dilip's various communication servers 56-66.

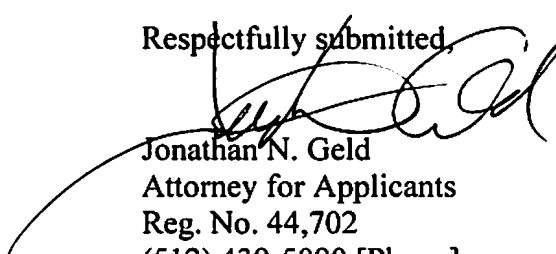
For at least these reasons, Applicants respectfully submit that Dilip fails to provide disclosure of all the limitations of independent Claims 2, 15, 21, 34 and 49, as amended, and that these claims are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.



**CONCLUSION**

In view of the remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5090.

Respectfully submitted,



Jonathan N. Geld  
Attorney for Applicants  
Reg. No. 44,702  
(512) 439-5090 [Phone]  
(512) 439-5099 [Fax]